

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE: DOCKET TO DETERMINE THE)
COMPLIANCE OF BELL SOUTH)
TELECOMMUNICATIONS, INC.'S)
OPERATIONS SUPPORT SYSTEMS)
WITH STATE AND FEDERAL)
REGULATIONS)

OFFICE OF THE
EXECUTIVE SECRETARY
DOCKET NO. 01-00562

COMMENTS OF THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION

The Southeastern Competitive Carriers Association ("SECCA") supports the First Report and Recommendation of the Pre-Hearing Officer that the Tennessee Regulatory Authority (the "Authority") hire an "independent third party consultant" at BellSouth's expense to determine what, if any, testing of BellSouth's OSS is needed and, if so directed by the Authority "to conduct such testing."

As this docket develops, SECCA believes that it will become increasingly apparent to the consultant and to the Authority that BellSouth is not providing Tennessee CLECs with adequate access to BellSouth's OSS and that a complete investigation of that system must be conducted by the TRA or its designee.

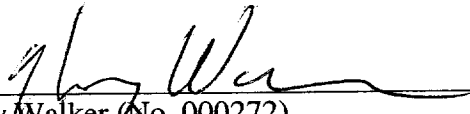
As detailed in the comments filed by ATM/Discount Communications, Inc. ("Discount") and by Access Integrated Networks, Inc. ("Access") in TRA docket 01-00193 (performance measures and enforcement mechanisms), BellSouth's LENS system, which is part of its OSS, is continually out of service. See the attached list of outages filed by Access in Docket 01-00193..

Moreover, as detailed in the comments of Discount, BellSouth uses these OSS problems to its competitive advantage.¹

It is clear that, regardless of the findings of other state commissions, CLECs serving customers in Tennessee cannot rely on BellSouth's OSS to place orders. As it has done in other contexts *i.e.*, performance measures and liquidated damages, extended loops, and reciprocal compensation, the TRA should be among the leaders, not the followers, of those states that are making pro-competitive decisions in the BellSouth region. That means a full-scale investigation of BellSouth's OSS. The Pre-Hearing Officer's Recommendation is an important step in that direction – but only the first one.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

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¹ Discount's Comments included the following incident : When LENS is down, Discount tries to place orders manually to the "LCSC" where, typically, telephones ring unanswered, faxes are ignored, and BellSouth representatives are unhelpful, if not rude. (See letter dated December 15, 2000.) In one case, an LCSC representative informed Discount the LCSC "does not process orders after 3 p.m. on Saturday," although Discount had placed orders on Saturday afternoons many times in the past. Believing that BellSouth would process orders for its own customers, Discount vice president Morris Harris personally visited a BellSouth payment center on that same Saturday at 5 p.m. He paid the overdue bill of a BellSouth customer and asked that the customer's service be restored. Service was restored that same afternoon.

1 Q. WHAT DO YOU MEAN WHEN YOU SAY THAT YOU HAVE HAD
2 TROUBLE WITH OSS RESPONSIVENESS?

3 A. Access places orders to BellSouth via LENS, the electronic preorder and order
4 interface developed by BellSouth and Robotag, a BellSouth proprietary TAG front-
5 end interface. These interfaces utilize TAG, BellSouth's electronic gateway for all
6 electronic order processing. The TAG interface must be working in order for
7 LENS/Robotag to function. CLECs like Access are completely reliant on BellSouth
8 and these systems because, as a UNE-P provider, all the components of the end-
9 users' service are provided by BellSouth. However, there have been numerous
10 BellSouth system problems related to TAG.

11

12 Several due dates for the 'fixes' to TAG have been promised, the latest implemented
13 in November, 2000. However, we continue to experience reliability problems with
14 TAG, including some after the November 'fix'. Specifically, we experienced TAG-
15 related outages on the following days:

16

17- *November 1, 2000*

18

19- *November 6, 2000*

20

21- *November 9, 2000*

22

23- *November 14, 2000*

24

25- *November 15, 2000*

26

27- *Week of November 18, 2000*

1. *December 18, 2000*
- 2
3. *December 20, 2000*
- 4
5. *December 21, 2000*
- 6
7. *January 15, 2001*
- 8
9. *January 16, 2001*
- 10
11. *January 17, 2001*
- 12
13. *January 24, 2001*
- 14
15. *January 29, 2001*
- 16
17. *February 2, 2001*
- 18
19. *February 8, 2001*
- 20
21. *February 9, 2001*
- 22
23. *February 13, 2001*
- 24
25. *February 14, 2001*
- 26
27. *February 15, 2001*
- 28
29. *February 19, 2001*
- 30
31. *February 23, 2001*
- 32
33. *February 26, 2001*
- 34
35. *March 1, 2001*
- 36
37. *March 2, 2001*
- 38

1· *March 8, 2001*
2
3· *March 13, 2001*
4
5· *March 19, 2001*
6
7· *March 20, 2001*
8
9· *March 22, 2001*
10
11· *March 26, 2001*
12
13· *March 27, 2001*
14
15· *March 28, 2001*
16
17· *March 29, 2001*
18
19· *April 2, 2001*
20
21· *April 3, 2001*
22


23 The duration of these outages varies widely, but all have been extremely disruptive
24 and inhibited the company from both converting new customers and supporting
25 existing customers. As a UNE-P provider, Access is completely dependent on the
26 reliability of BellSouth systems. Outages, such as those described above, completely
27 debilitate the company. Much of the conversion order entry as well as
28 add/move/change activity of its installed base comes to a complete halt. These types
29 of problems in the BellSouth system cause backlogs in our service, and impair our
30 ability to provide the exceptional customer satisfaction that is the hallmark of our
31 company. These problems impact Access' ability to provide service in all of its
32 markets.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 11th day of May, 2001.

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